

EXHIBIT 191

**I IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)

Plaintiff,)

V.)

Case No. 4:17-cv-00454-GKF-JFJ

1) CASTLE HILL STUDIOS LLC)
(d/b/a CASTLE HILL GAMING);)

DECLARATION OF SHELDON WATKINS

2) CASTLE HILL HOLDING LLC)
(d/b/a CASTLE HILL GAMING); and)

3) IRONWORKS DEVELOPMENT, LLC)
(d/b/a CASTLE HILL GAMING))

Defendants.)

DECLARATION OF SHELDON WATKINS

1. I am a Regional Manager of Field Services at VGT. I have held this position since January 2018 and have worked in the field services department at VGT since I was first hired in October 2005.

2. In or around March 2018, I was at Choctaw Casino in Pocola, Oklahoma, as part of my work responsibilities doing a walk-through of the casino floor to check on the status of VGT's games and to talk to casino employees.

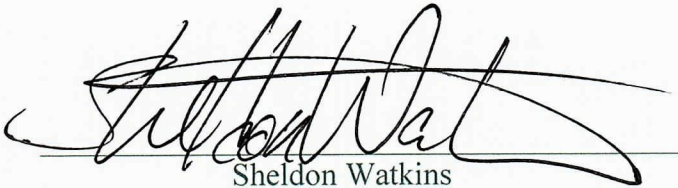
3. As I was walking the casino floor, I saw a bank of games that I thought belonged to VGT.

4. I noticed one of the games in the bank was displaying an error message so I texted the VGT game technicians who were also working in the casino that day and asked them to fix the game.

5. Shortly thereafter, I met up with one of the VGT game technicians—Craig Eubanks—who said something about how he had gone to investigate the broken machine but that he could not fix it.

6. I believe that one of the other VGT game technicians—Steven Stanart—and I then went over to the broken machine and realized that it was a Castle Hill game, not a VGT game.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief. Executed this 4 day of June 2018 in Fort Smith, Arkansas.


Sheldon Watkins